IV. <u>CONCLUSION</u>

As demonstrated above, the Commonwealth urges the Commission to adopt the Joint Board recommendations subject to the revisions and modifications discussed herein.

Respectfully submitted,

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for Telecommunications and Utilities
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Commonwealth of the Northern
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COUNSEL FOR THE COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS

Dated: December 19, 1996

Exhibit A

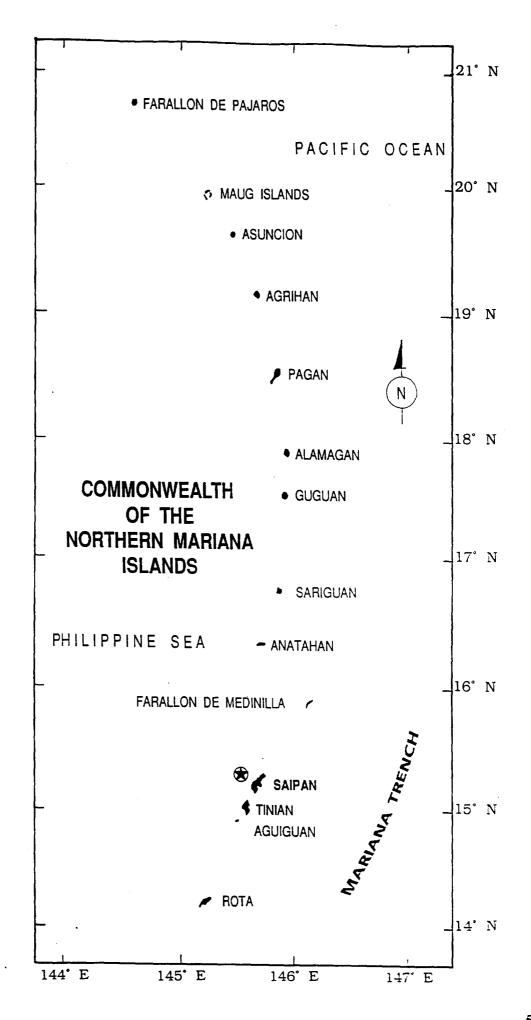


Exhibit B



CATALOG

MTC is a full-service telecommunications company with a wide variety of services to meet your residential and business communications needs. For more information on residential and single-line business services, contact our Customer Service Centers on Saipan (234-7143), Rota (532-3599), and Tinian (433-0210). Multi-line business customers please call our Business Sales Office at 682-2877.

MTC LONG DISTANCE

Choose MTC as your preferred long distance company and enjoy the value, commitment, and service you expect from the best, including: clear, reliable connections over fiber optic and digital technology; competitive rates; economical one-minute minimum direct-dial rates for voice and fax worldwide; free, convenient World Pass_{SM} Calling Card; free International 800 service and paid access to U.S. 800 numbers; technical expertise backed by the strength of GTE; and operators located on Saipan. To sign up for MTC Long Distance, call 682-2877 or stop by the MTC Customer Service Center.

WORLD PASS... CALLING CARDS

You can use your World Pass_{SM} Card to call interisland or long-distance from any phone in the CNMI (except those totally restricted for long distance) and charge it to your home or business phone number. There is no fee or surcharge for the card, and calls can be direct-dialed to take advantage of MTC's economical direct dial rates. Apply at the MTC Customer Service Center. See also page 10.

INTERNATIONAL OPERATOR DIRECT CONNECTION

Operators at selected overseas locations can be called directly from the CNMI by dialing free MTC access numbers. Customers can speak to operators in their own language to place a calling card or collect call. Please see the back cover of this phone book for access numbers. For additional codes, consult your long distance carrier (00).

800 SERVICE

MTC offers free International 800 service to CNMI customers in cooperation with other international carriers. Since there are thousands of U.S. 800 numbers, and only a few companies have included the CNMI in their toll-free calling area. MTC also offers paid direct dial access to U.S. 800 numbers that are accessible from the entire domestic U.S. These calls are charged at MTC's economical direct dial rates.

Free International 800 Service: Dial 1 + 800 + XXX-XXXX

Paid Access to 800 Numbers: Dial 011 + 1 + 880 + XXX-XXXX

LONG DISTANCE CALLING CENTERS

Make overseas calls at economical direct dial rates at MTC Long Distance Calling Centers located conveniently throughout the CNMI. Some centers also offer facsimile service. Look for the "MTC" sign or call 682-2877 for the location nearest you.



Exhibit C



P.O. BOX 1370 CK BAPAN, MP 96950



STATE BOARD OF EDUCATION PUBLIC SCHOOL SYSTEM

FACSIMILE COVER SHEET

: Dave Ecret TO

FAX#

: 664-2211

DATE : December 10, 1996

COP

SUBJECT: FCC Discount Matrix

: William S. Torres

ADDRESS: Nauru Bidg.

SENDER: Tim

NO. OF PAGES TO BE SENT (including this cover page):

MESSAGE:

Dear Dave:

FROM

Thank you for your fax on the subsidies offered by the FCC. For FY 1996, we served over 1,485,000 nutritious school meals to the children enrolled in our CNMI schools. We serve over 6,500 school lunches every school day. School meal participation is slightly under 70% of the average daily attendance at our schools when data from all schools is combined. Many of our public elementary school regularly show school meal participation of over 90%. In general school meal participation is higher at our elementary schools than at our secondary schools. Also, school participation is much higher at our public schools than at private schools.

If you have any questions or need additional information, please let me know.

Best wishes.

TEL: (670)684-8700/01/02

664-3704/08/10/11/20

FAX: (670)664-3788/81/92

Exhibit D



COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS

P.O. BOX 1370 CK SAIPAN, MP 96950



MEMORANDUM

December 11, 1996

MEL C. GUITUGLIA

: Mr. Tom Crowe, Attorney for CNMI Telecommunications

TUDENT REP.

: Commissioner of Education

LEGAL COUNSEL SEAN E. FRINK

SUBJECT: Student Ratios for FCC Universal Services

On Dec. 10, 1996, Dave Ecret, Special Assistant Telecommunications and Utilities, faxed us a request to assist him in answering three questions resulting from his last meeting with the Federal Communications Commission. Mr. Ecret asked us to provide this information to you to assist in a response to the F.C.C. regarding Universal Services Subsidies for Schools and Libraries.

The matrix proposed by the FCC does not adequately afford the CNMI the necessary discount to access critical services. Mr. Ecret has briefly explained an addition to the current matrix we feel more adequately identifies the needs of the CNMI Public School System.

The Food and Nutrition Services, Actual Meal Count Participation reports for the months of August, September, and October (1996) show a combined total of 148,483 free lunches and 133,986 paid lunches served to Public School System Students. Or, 53% of Public School System students receive free lunch under the National School Lunch Program.

The CNMI Public School System Facts and Figures, School Year: 1996-97, publication, states there are 2,699 students attending private schools in the CNMI and 8,464 students attending Public Schools for a ratio slightly more than 31%.

William S. Torres

(670)664-3700/01/02

664-3704/08/10/11/20

FAX: (670)664-3798/91/92

FOOD AND NUTRITION SERVICES COMMONWEALTH OF NORTHERN MARIANA ISLANDS PUBLIC SCHOOL SYSTEM SAIPAN, MP 96950



DECTROTED OF SULFRONT CAMEL, COV.

ACTUAL MEAL COUNT PARTICIPATION

MONTH OF: OCTOBER 1996

BREAKFAST LUNCH

		BREAK	PASI	LUNCH			
PUBLIC & PRIVATE SCHOOL	NO. DAY	PAID	FREE	TOTAL BF	PAID	FREE	TOTAL LNCH
CK DANDAN	18	0	494	494	0	494	494
CHALAN KANOA HEADSTART	18	0	800	800	0	1440	1440
GARAPAN ELEM SCHOOL	13	171	1366	1537	4260	4228	8488
GARAPAN HEADSTART	18	0	451	451	0	765	765
GREGORIOT, CAMACHO ELEM	13	388	1000	1388	1770	1893	3663
HOPWOOD JR HIGH SCHOOL	22	3352	3778	7130	7749	5725	13474
KOBLERVILLE ELEM	13	231	1837	2068	1524	2890	4414
KAGMAN HEADSTART	8	0	206	206	0	236	236
MARIANAS HIGH SCHOOL	22	312	305	617	2602	781	3383
MT. CARMEL ELEM. & HIGH	22	0	0	0	7417	0	7417
CLEANELISM SCHOOL	11	234	2114	2348	2335	3036	5371
CLEA! HEADSTART	18	0	439	439	0	781	781
PAOPAO HEADSTART	18	0	410	410	0	410	410
SAN ANTONIO ELEM SCHOOL	13	356	876	1232	1871	1848	3719
SAN ANTONIO HEADSTART	18	0	753	753	0	753	753
SAN ANTONIO PEER PROG.	18	0	272	272	0	272	272
SAN VICIENTE DANDAN	18	0	1188	1188	0	1188	1188
SAN VICENTE ELEM	22	632	3317	3949	7458	6505	13963
SAN VICENTE HEADSTART	18	0	360	360	0	720	720
SR REMEDIO PRE-SCHOOL	22	351	92	443	347	93	440
SUSUPE HEADSTART	18	0	348	348	0	348	348
TANAPAG ELEM SCHOOL	13	262	1148	1410	1246	2159	3405
TANAPAG HEADSTART	18	Ö	1080	1080	0	1080	1080
WILLIAM S. REYES	13	503	2445	2948	3336	4584	7920
TINIAN HIGH SCHOOL	22	292	339	631	- 1475	658	2133
TIMAN ELEM, SCHOOL	13	724	1238	1962	2312	1890	4202
TIMAN HEADSTART	17	0	\$55	555	0	555	555
TINIAN GRACE CHRIST. ACAD.	20	802	24	826	1525	24	1549
ROTA HEADSTART	18	0	524	524	0	524	524
ROTAHIGH	18	145	225	370	5 65		565
ROTA ELEMENTARY	9	263	569	832	1173	1459	2632
ROTA EARLY CHILDHOOD PROG	18	169	0	169	209	0_	209
SINAPALO HEADSTART	15	0	211	211	С	211	211
SINAPALO KINDER	6	20	64	84	50	87	137
ESKUELAN SAN FRANCISCO DE	22	1403	50	1453	2387	63	2450
TOTAL B/F & LUNCH		9187	28553	37740	49174	47339	96513

FOOD AND NUTRITION SERVICES CUMMONWEALTH OF NORTHERN MARIANA ISLANDS PUBLIC SCHOOL SYSTEM SAIPAN, MP 96950

ACTUAL MEAL COUNT PARTICIPATION

MONTH OF: SEPT. 196

		BREAKFA	ST	LUNCH			
PUBLIC & PRIVATE SCHOOL	NO. DAY	PAID	FREE	TOTAL BF	PAID	FREE	TOTAL LNCH
C.K. DANDAN	15	0	372	372	0	398	398
CHALAN KANOA HEADSTART	14	0	585	585	0	982	982
GARAPAN ELEM SCHOOL	17	395	1991	2386	6762	6161	12923
GARAPAN HEADSTART	14	0	290	290	0	570	570
GREGORIO T, CAMACHO ELEM	18	577	1637	2214	2614	2861	5475
HOPWOOD JR HIGH SCHOOL	18	2804	2910	5714	6337	4589	10926
KONEWILEREM	18	415	2315	2730	2187	4058	6245
MARANAS HIGH SCHOOL	18	232	140	372	2838	445	3283
MT. CARNEL ELEM. & HIGH	18	0	0	0	6135	0	6135
CLEAN ELEMA SCHOOL	18	458	3504	3962	3700	5084	8784
OLEAI HEADSTART	15	0	306	306	0	606	606
SAN ANTONIO ELEM SCHOOL	18	378	1183	1561	2457	2157	4614
SAN ANTONIO HEADSTART	14	0	663	663	0	603	603
SAN ANTONIO PEER PROG.	15	0	216	216	0	216	216
SAN VICENTE DANDAN	14	0	870	870	Q	870	870
SAN VICENTE ELEM	18	567	2723	3290	6046	5489	11535
SAN VICENTE HEADSTART	14	0	259	259	0	459	459
SR. FEMEDIO PRE-SCHOOL	18	276	75	351	275	73	348
SUSLIPE HEADSTART	14	0	299	299	O	299	299
TANAPAG ELEM SCHOOL	18	244	1623	1867	1225	3296	4521
PAOPAO HEADSTART	14	0	262	262	0	262	262
KAGMAN HEADSTART	14	0	284	284	0	394	394
TANAPAG HEADSTART	14	0	804	804	0	804	804
WILLIAM S. REYES	18	682	3605	4287	4623	7821	12444
TINIAN HIGH SCHOOL	18	218	284	502	- 1495	535	2030
TIMAN ELEM SCHOOL	18	1178	1595	2773	3497	2577	6074
TINIAN HEADSTART	15	0_	451	451	0	451	451
TIMAN GRACE CHRIST, ACAD.	18	746	18	764	1287	17	1304
ROTA HEADSTART	16	0	554	554	0	554	554
ROTAHIGH	20	139	268	407	863	890	1753
ROTA ELEMENTARY	20	544	1467	2011	2442	3496	5938
ROTA EAFLY CHILDHOOD PROG		167	0	167	188	0	188
SNAPALO ELEM SCHOOL	16	61	192	253	110	235	345
ESIQUELAN SAN FRANCISCO D.E	19	1298	54	1352	2251	54	2315
TOTAL BUF & LUNCH	<u> </u>	11379	31799	43178	57342	57306	114648

REVISED FNS-FORM JAN. 1986

FOOD AND NUTRITION SERVICES COMMONWEALTH OF NORTHERN MARIANA ISLANDS PUBLIC SCHOOL SYSTEM SAIPAN. MP 96950

12 6 8 6 6 2 2 2 2 U

ACTUAL MEAL COUNT PARTICIPATION

MONTHOF: AUGUST '1996

٠, ٠ BREAKFAST LUNCH NO. DAY TOTAL BF PUBLIC & PRIVATE SCHOOL PAID FREE PAID FREE TOTAL LNCH CIK DANDAN CHALAN KANOA HEADSTART GARAPAN ELEM SCHOOL GARAPAN HEADSTART GREGORIOT, CAMACHO ELEM HOPWOOD JR HIGH SCHOOL MOBLERVILLE ELEM MAFIANAS HIGH SCHOOL MT. CARMEL ELEM & HIGH CLEANELEM SCHOOL CLEAN HEADSTART SAIPAN COMMUNITY SCHOOL SAN ANTONIO ELEM SCHOOL SAN ANTONO HEADSTART
SAN ANTONO PEER PROG. SAN VICENTE DANDAN SAN VICENTE ELEM SAN VICENTE HEADSTART SR REMEDIO MESCHOOL SUSLIFE HEADSTART TANAPAGELEM SCHOOL TANAPAG HEADSTART WILLIAM & REYES TIMAN HIGH SCHOOL TIMAN ELEM, SCHOOL TIMIAN HEADSTART TIMAN GRACE CHRIST. ACAD. ROTA HEADSTART ROTAHIGH POTABLEMENTARY ROTAEARLY CHILDHOOD PROG. SINAPALO ÉLEM SCHOOL ESKUELAN SAN FRANCISCO D.B. TOTAL B/F & LUNCH

REVISED FNS-FORM JAN. 1986

Exhibit E



THE STATE OF THE STATE OF THE

INTERISLAND DIALING INSTRUCTIONS for calls between Saipan, Tinian and Rota

DIRECT-DIAL CALLS

Zatigit telep

Example: To call Rota from Saipan: 1 + 532-XXXX

OPERATOR-ASSISTED CALLS

+

7-digit telephone number

Example: To call Tinian from Saipan: 0 + 433-XXXX

After you have finished dialing, an operator will come on the line to get your billing information and assist in completing your call.

INTERISLAND RATES

All interisland calls in the CNMI are handled by MTC. Dial "0" for information and assistance.

INTERISLAND RATES							
OPERATOR 3 MINUT		CUSTOMER DIRECT-DIAL	EACH ADDITIONAL				
STATION-TO-STATION	PERSON-TO-PERSON	1 MINUTE RATE	MINUTE				
\$.75	\$1.50 ₃	\$ 25	\$.25				

Rates are subject to change.



CERTIFICATE OF SERVICE

I, Guled Hersi, serving as secretary to the Law Offices of Thomas K. Crowe, P.C., hereby certify that a copy of the foregoing Comments of the Commonwealth of the Northern Mariana Islands was sent by first class United States mail, postage pre-paid, or by hand delivery where indicated by an asterisk (*), this 19th day of December, 1996, to the following:

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Room 814
Washington, DC 20554

The Honorable Rachelle B. Chong *
Commissioner
Federal Communications Commission
1919 M Street, N.W.
Room 844
Washington, DC 20554

The Honorable Susan Ness *
Commissioner
Federal Communications Commission
1919 M Street, N.W.
Room 832
Washington, DC 20554

The Honorable James H. Quello *
Commissioner
Federal Communications Commission
1919 M Street, N.W.
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The Honorable Julia Johnson Commissioner Florida Public Service Commission 2540 Shumard Oak Blvd. Gerald Gunter Building Tallahassee, FL 32399-0850 The Honorable Kenneth McClure Commissioner Missouri Public Service Commission 301 W. High Street Suite 530 Jefferson City, MO 65101

The Honorable Sharon L. Nelson Chairman Washington Utilities and Transportation Commission P.O. Box 47250 Olympia, WA 98504-7250

The Honorable Laska Schoenfelder Commissioner South Dakota Public Utilities Commission 500 E. Capital Street Pierre, SD 57501-5070

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Guled Hersi